

Exhibit C

Filed Under Seal

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

DYNAMIC DATA TECHNOLOGIES, LLC, §

Plaintiff, §

v. §

GOOGLE LLC AND YOUTUBE, LLC, §

Defendants. §

Civil Case No. 2:18-cv-466-RWS

**DECLARATION OF SALLIE LIM IN SUPPORT OF GOOGLE LLC AND YOUTUBE,
LLC'S MOTION TO DISMISS UNDER RULE 12(B)(3) and 12(B)(6)**

I, Sallie Lim, declare and state as follows:

1. I am a Director in the Legal department at Google LLC ("Google"). I work at Google's offices in Mountain View, California. I have been a Google employee since May 2006.
2. I provide this declaration in support of Defendants' Motion to Dismiss Under Rule 12(B)(3) and 12(B)(6) the Complaint filed by Dynamic Data Technologies ("DDT") on November 5, 2018. I submit this declaration based on my personal knowledge of the corporate structure of Google and its wholly owned subsidiary, YouTube, LLC ("YouTube") and review of relevant company records.
3. Based on my review of company records, as of November 5, 2018, Google and YouTube did not own or lease any office space, retail space, or other real property in the Eastern District of Texas, which I understand includes the counties identified on the Court's website

(<http://www.txed.uscourts.gov/court-locator>). And Google and YouTube still do not own or lease any office space, retail space, or other real property in the Eastern District of Texas today.

4. As of November 5, 2018 and continuing to today, Google's only Texas offices were located in Austin, San Antonio and Dallas (Google's Dallas office is located in Addison, Texas), cities outside this District. As of November 5, 2018 and continuing to today, YouTube does not have any Texas offices.

5. As of November 5, 2018 and continuing to today, neither YouTube nor Google had data centers in the Eastern District of Texas.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 10, 2018, in New York, New York.


Sallie Lim